

USPTO Customer No. 25280

FEB 27 2007

Case No. 5635

REMARKS/ARGUMENTS

Claims 1-14 were pending in the application. Claim 1 has been amended. No claims have been added or cancelled.

Obviousness Rejections

Claims 1-14 stand rejected under 35 U.S.C. §103(a) as being obvious over Gray (US 4,897,989). Continued rejection on these grounds is respectfully traversed and reconsideration is requested.

In order to establish a *prima facie* case of obviousness there must be some suggestion or motivation that would lead to the claimed invention. The suggestion or motivation may derive from the references themselves or from the knowledge generally available to those of skill in the art. In addition, all the claim limitations must be taught or suggested by the prior art (MPEP § 2142). Applicants respectfully submit that these standards are not met with regard to the claims as now presented.

The claims have been amended to recite that at least some of the tufts consist of groups of continuous filament non-textured fibers. Support for the recited feature is found at various locations throughout the specification. By way of example only, paragraph 33 states that a base portion is provided and the continuous filament non-

USPTO Customer No. 25280

Case No. 5635

textured yarn is formed into a plurality of tufts upon the base portion so that the tufts and base portion define a fabric structure.

As best understood, the recited feature that at least some of the tufts consist of groups of continuous filament non-textured fibers is in no way taught or suggested by the cited art. In particular, as best understood, the Gray '989 patent teaches that the textured fibers are an essential component of the disclosed three-ply yarn. Therefore, one of ordinary skill in the art, having read the Gray '989 patent, would have had no motivation to modify the Gray '989 patent in such a way as to eliminate the textured fiber from the yarn used to form pile tufts. In the absence of such motivation, it is respectfully submitted that the outstanding rejection cannot be maintained.

Conclusion:

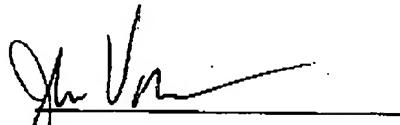
For the reasons set forth above, it is respectfully submitted that all claims now stand in condition for allowance. Should any issues remain after consideration of this Amendment and accompanying Remarks, the Examiner is invited and encouraged to telephone the undersigned in the hope that any such issue may be promptly and satisfactorily resolved.

To any extent required, a request for extension of time is hereby made. In the event that there are additional fees associated with the submission of these papers (including extension of time fees), authorization is hereby provided to withdraw such fees from Deposit Account No. 04-0500.

USPTO Customer No. 25280

Case No. 5635

Respectfully submitted,



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